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JOINT REPLY DECLARATION OF PAUL A. LACOUTURE AND VIRGINIA P. RUESTERHOLZ

ATTACHMENT J

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JOINT REPLY DECLARATION OF PAUL A. LACOUTURE AND VIRGINIA P. RUESTERHOLZ

ATTACHMENT K

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JOINT REPLY DECLARATION OF PAUL A. LACOUTURE AND VIRGINIA P. RUESTERHOLZ

ATTACHMENT L

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M

JOINT REPLY DECLARATION OF PAUL A. LACOUTURE AND VIRGINIA P. RUESTERHOLZ

ATTACHMENT M

TT00-83

October 13, 2000

Department of Telecommunications & Energy
Commonwealth of Massachusetts
1 South Station
Boston, Massachusetts 02110

ATTENTION: Senior Rate Analyst

We are hereby filing as of October 13, 2000, for effect November 12, 2000, tariff material consisting of the following:

D.T.E. – MA – No. 17

Part B	Section 5	Original of Pages 7-11
Part B	Section 19	Original of Pages 1-6

Verizon Massachusetts ("Verizon MA") files the above pages in compliance with those portions of the D.T.E. 98-57 (Phase II) Order issued September 29, 2000, in which the Department directed Verizon MA to revise certain tariff provisions to reflect FCC rules. Since this compliance filing is limited to those provisions and prejudices no carrier, Verizon MA requests that the Department approve this filing immediately and permit Verizon MA to implement the changes in less than the 30 day statutory notice period. Upon such approval, Verizon MA will file substitute tariff pages reflecting the new tariff effective date. Notwithstanding this filing, Verizon MA reserves the right to move for reconsideration of the Department's Order.

Attached are the necessary copies of the tariff pages. Please return the copy with your stamp of receipt.

Respectfully submitted,

President - Massachusetts

5. Local Loops
5.4 xDSL Qualified and Digital Designed Links

5.4.1	Description
A.	xDSL links provide transmission technologies capable of supporting the following DSL technologies.
1.	Asymmetrical Digital Subscriber Line (ADSL)
2.	High-Bit Rate Digital Subscriber Line (HDSL)
3.	Symmetrical Digital Subscriber Line (SDSL)
4.	Integrated Digital Subscriber Line (IDSL)
5.	Other DSL technologies to the extent that standards are identified and approved by ANSI (T1E1). These xDSL technologies are provisioned on qualified facilities, which include twisted pair copper loop plant, and use line codes as specified in ANSI standards.
B.	**Digital Two-Wire Link (including ADSL, HDSL, SDSL and IDSL)**—Provides a channel equivalent to a two-wire, non-loaded, twisted copper pair loop from an end user's premises to a POI at a collocation arrangement in the Telephone Company's central office. These links are provisioned in accordance with the technical specifications approved and adopted by ANSI.
1.	The digital two-wire link is available where qualified facilities exist. The Telephone Company will not construct new copper facilities to provide these links.
2.	Only non-loaded and non-repeated twisted cable pairs that do not exceed a technical length limitation as specified in ANSI documentation can support xDSL capabilities.
C.	**Digital Four-Wire Link (including HDSL)**—Provides a channel equivalent to two two-wire, non-loaded, twisted pair copper from an end user's premises to a POI at a collocation arrangement in the Telephone Company's central office. These links are provisioned in accordance with the technical specifications approved and adopted by ANSI.
1.	The digital four-wire link is available where qualified copper facilities exist. The Telephone Company will not construct new copper facilities to provide these links.
2.	Only non-loaded and non-repeated twisted cable pairs that do not exceed a technical length limitation as specified in ANSI documentation can support xDSL capabilities.
D.	**Digital Designed Links**—At the option of the TC, the Telephone Company will condition links. The Telephone Company will also add ISDN range extensions to the copper portion of a two-wire digital ISDN capable link, if requested. Requests for link designs other than the standard options listed below, will be handled on a Bona Fide Request basis as specified in Part A, Section 2.
1.	Two-wire digital ADSL conditioned designed metallic link with total loop lengths of 18,000 to 30,000 feet, no load coils, with standard bridged tap of less than 6,000 feet.
2.	Two-wire ADSL qualified link of less than 18,000 feet with bridged tap removed.

5. Local Loops
5.4 xDSL Qualified and Digital Designed Links

5.4.1 Description	
D.	(Continued)
3.	Two-wire ADSL qualified link of less than 12,000 feet with bridged tap removed.
4.	Two-wire HDSL qualified link of less than 12,000 feet with bridged tap removed.
5.	Four-wire HDSL qualified link of less than 12,000 feet with bridged tap removed.
6.	Two-wire digital designed metallic ISDN-capable link with Telephone Company placed ISDN loop extension electronics.
7.	Two-wire SDSL qualified link with bridged tap removed.
8.	Two-wire IDSL qualified link of less than 18,000 feet with bridged tap removed.

5.4.2 Ordering Service	
A.	The TC must specify the xDSL technology to be provided over the DSL loop to allow the Telephone Company to identify and manage various advanced services technologies within binder groups.
B.	xDSL links must be pre-qualified to ensure that the loop being provisioned meets the technical characteristics of a link able to support compatible DSL technologies that meet applicable ANSI standards.
1.	**Mechanized Pre-Qualification Database**—The TC must utilize this database in advance of submitting an order to determine whether a given loop is qualified for xDSL per Telephone Company standards. The information provided includes total metallic loop length (including bridged taps), presence of load coils (yes or no), presence of digital loop carrier (yes or no), presence of interferors (yes or no), presence of digital single subscriber carrier (DSSC), and qualification for xDSL per Telephone Company standards (yes or no). This additional information may be used by the TC when ordering a digital designed link. This database is currently being built on a central office by central office basis.
a.	In some cases, based on the information returned on the query, the TC may submit an order for conditioning a loop to make it xDSL compatible as a digital designed link.
2.	**Manual Loop Qualification**—The TC may request manual loop qualification where the mechanized loop qualification database is not available. The information provided includes total metallic loop length (including bridged taps), presence of load coils (yes or no), presence of digital loop carrier (yes or no), presence of interferors (yes or no), presence of digital single subscriber carrier (DSSC), and qualification for xDSL per Telephone Company standards (yes or no). This additional information may be used by the TC when ordering a digital designed link.
a.	The TC may submit an order for conditioning a loop to make it xDSL compatible as a digital designed link.

5. Local Loops
5.4 xDSL Qualified and Digital Designed Links

5.4.2 Ordering Service	
B.	(Continued)
3.	**Engineering Query**—The TC may request information about a link from Telephone Company records beyond that supplied by the mechanized prequalificiation database or by manual loop qualification. Information such as length, number and location of bridged taps, number and location of load coils, location of digital loop carrier, or cable gauge at specific locations from Telephone Company cable records may be requested.
4.	**Engineering Work Order**—When the TC orders digital designed links, an engineering work order is required in order to verify facilities availability, write the work order, and prepare the special bill generated as a result of construction.

5.4.3 Responsibility of the Telephone Company	
A.	The Telephone Company will make trouble report status available to the TC.
B.	The suspension/termination of a TC's link for non-payment or for a cause other than non-payment will result in the suspension/termination of the link. The Telephone Company will notify the TC prior to the termination date. The Telephone Company reserves the right to take the following actions if the TC's link creates interference or impairment with other Telephone Company facilities or services.
1.	Locate another loop that will not create interference or impairment and perform a line and station transfer, or
2.	Demonstrate to the DTE that the original loop cannot be conditioned to adequately eliminate interference or impairment with other Telephone Company facilities or services, and that there is no alternative loop available to which the TC's data service can be moved.

5.4.4 Responsibility of the TC	
A.	The TC is responsible for coordinating with the Telephone Company to ensure that the unbundled element is installed in accordance with the TC's request.
B.	The TC is responsible for initiating, testing and sectionalizing (isolating) all end user trouble reports. The Telephone Company is responsible for testing, if necessary, with the TC to clear a trouble when the trouble has been previously sectionalized to the link.
C.	The TC is responsible for providing a contact number that is readily accessible 24 hours a day, 7 days a week.

5. Local Loops
5.4 xDSL Qualified and Digital Designed Links

5.4.5 Regulations	
A.	All preordering, ordering, provisioning, maintenance and billing requests will be handled through the use of the Telephone Company's Direct Customer Access Service (DCAS) System.
B.	A change from one TC to another is considered a disconnect of the xDSL qualified link from the original TC and a connect of an xDSL qualified link with the new TC.
C.	At the request of the TC, the Telephone Company will provide continuity testing with the TC.

5.4.6 Conditioning Options	
A.	**Remove Load Coils**—Telephone Company removal of load coils on a loop at the request of the TC.
B.	**Remove Bridged Taps**—Telephone Company removal of single or multiple bridged taps at the request of the TC.
C.	**Addition of ISDN Extensions**—Telephone Company electronics added to the copper portion of a two-wire digital ISDN-capable link so that it may provide service at lengths greater than 18,000 feet.

5.4.7 Application of Rates and Charges	
A.	The following NRCs apply (refer to Part A, Section 3.3).
1.	Service Order (on a standard basis or an expedited basis, as appropriate).
2.	Service Connection-Central Office Wiring
3.	Service Connection-Other
4.	Manual Intervention Surcharges (on a standard basis or an expedited basis, as appropriate).
5.	Installation Dispatch Out
6.	Customer Misdirect-In
7.	Customer Misdirect-Out
8.	Customer Not Ready-Out
9.	Dispatch Out of Hours
B.	The following loop qualification rates and charges apply as appropriate.
1.	**Mechanized Loop Qualification Monthly Rate** applies per link pre-qualified using the Telephone Company's mechanized qualification database.
2.	**Manual Loop Qualification NRC** applies per link prequalified using manual process.

5. Local Loops
5.4 xDSL Qualified and Digital Designed Links

5.4.7 Application of Rates and Charges	
B.	(Continued)
3.	**Engineering Query NRC** applies per link when a TC requests loop information from Telephone Company records beyond that supplied by manual loop qualification. This charge always applies when a TC orders a digital designed link.
C.	The following digital designed link rates and charges apply as appropriate. These rates and charges are in addition to all monthly rates and NRCs associated with the underlying xDSL links.
1.	**Engineering Work Order NRC** applies per digital designed link ordered.
2.	**Remove Load Coil NRC** applies per link requested. NRC varies depending on the length of the link. No charge applies for removal of load coils on links of less than 18,000 feet.
3.	**Addition of ISDN Loop Extension Electronics NRC** applies per link requested.
4.	**Remove Bridged Taps NRC** per link requested. There is one NRC for removal of a single, bridged tap. There is a different NRC if multiple bridged taps are removed. This NRC will not apply when a loop of less than 18,000 feet has bridged taps above 6,000 feet removed so that the total bridged tap length does not exceed 6,000 feet.
D.	Geographically deaveraged monthly rates apply per link.
E.	Service access charge and interconnection access charge elements contained in Part E (collocation) also apply.

19. Line Sharing
19.1 General

Rates and charges for service explained herein are contained in Part M, Section 2.19.

19.1.1 Description	
A.	A TC may request a line sharing arrangement for nondiscriminatory access to the high frequency portion of an existing copper loop for its own use. The Telephone Company provides and continues to provide analog circuit-switched voice grade services over the same copper loop.
1.	The high frequency portion of a loop is the frequency range above the voiceband on a copper facility that is being used to carry analog circuit-switched voiceband transmissions.
B.	The xDSL technology used by the TC for line sharing may include any version that conforms to the FCC's Code of Federal Regulations (CFR) Part 47, Section 51.230 and applicable ANSI standards.
C.	Access to line sharing is provided through collocation arrangements.

19.1.2 Ordering Service	
A.	**Pre-ordering**— A loop must first be pre-qualified, as described in Part B, Section 5.4.2, to determine whether the loop meets the technical characteristics of a link able to support an xDSL-based service that conforms to the FCC's CFR Part 47, Section 51.230.
B.	If conditioning is required to make a loop capable of supporting a line sharing arrangement, the Telephone Company will provide digital designed links as described in Part B, Section 5.4.1.
1.	The Telephone Company will condition any requested loop unless such conditioning will significantly degrade, as defined in the FCC's CFR Part 47, Section 51.233, the voiceband service being provided to the Telephone Company's end user customer over that same loop. In such cases, the Telephone Company will either locate another loop that can be conditioned, migrate the voiceband service to that loop and provide the TC with access to the high frequency portion of that loop; or demonstrate to the DTE that the original loop cannot be conditioned without significantly degrading the voiceband services on that loop and that there is no alternative loop available that can be conditioned or to which the customer's voiceband service can be moved, consistent with the FCC's CFR Part 47, Section 51.319(h)(5).
C.	In order for a loop to be eligible for line sharing, the following conditions must be satisfied for the duration of the line sharing arrangement.
1.	The loop must be an xDSL compatible copper loop that is presumed to be acceptable for shared line deployment in accordance with FCC rules.

19. Line Sharing
19.1 General

19.1.2 Ordering Service	
C.	(Continued)
2.	The Telephone Company must be providing simultaneous circuit-switched analog voice grade service to the customer served by the loop in question.
3.	The Telephone Company's end user customer's dial tone must originate from a Telephone Company end office switch in the wire center where the line sharing arrangement is being requested.
4.	The xDSL technology to be deployed by the TC on that loop must not significantly degrade, as defined in the FCC's CFR Part 47, Section 51.233, the performance of other services provided on that loop or interfere with the operation of other services in the same or adjacent binder groups.
a.	Binder groups are copper pairs bundled together, generally in groups of 25, 50 or 100.
D.	Splitter arrangements must be installed prior to submitting an order for line sharing (refer to Part E, Section 2.5 or 3.4).

19.1.3 Regulations	
A.	The Telephone Company and the TC will follow agreed upon standards and employ methods of operation that will not interfere with or impair the service or any facilities of the other or any third parties connected with or involved directly in the network of the other.
1.	Where suitable facilities exist, the Telephone Company will perform a pair swap of a loop from fiber to copper on the TC's behalf, provided that such swaps do not impair the service of any third parties involved. The Telephone Company will not be held responsible for any interruption in, or impairments of, service to any party as a result of this activity.
B.	The TC will work cooperatively with the Telephone Company in connection with the Telephone Company's effort to provide highly reliable voice grade local exchange service to its end user customer. Such cooperation will extend to a variety of possible matters, including but not limited to the following examples.
1.	Handling trouble reports
2.	Maintaining voice access to 911/E911
3.	Alarm conditions
4.	Maintaining database accuracy
5.	Dispatch to coordinate access and testing
6.	7 x 24 availability for emergency situations
7.	Notification of service failures

19. Line Sharing
19.1 General

19.1.3 Regulations	
C.	**Technical Specifications**—The xDSL technology used by the TC for line sharing arrangements must operate within the power spectral density limits set forth in T1.413.1998 (ADSL), T1.419-200 (Splitterless ADSL) or TR59-1999 (RADSL) and multiple virtual line (a proprietary technology) within the power spectral density limits of T1.601-1998 and within the transmit power spectral density limits of T1.601-1998.
D.	The Telephone Company and the TC will have joint responsibility to educate its end user customer regarding which service provider should be called for problems with their respective voice or advanced data service offerings.
E.	The Telephone Company and the TC will work together to address customer initiated repair requests and to minimize adverse impacts to the customer.
F.	Wideband test access, which provides mechanized line testing, will be available at the TC's option for maintenance purposes after the service order has been completed. The TC will utilize the circuit number to initiate a test.

19.1.4 Responsibility of the TC	
A.	The TC must provide an ANSI approved splitter at the wire center as described in Part E, Section 2.5 or 3.4.
B.	The TC must provide its own DSLAM equipment in a collocation arrangement and any necessary CPE for the xDSL service it intends to provide (including CPE splitters, filters, and/or other equipment necessary for the end user to receive separate voice and advanced data services across the shared loop).
C.	The TC must notify the Telephone Company's voice customer that a disruption of the customer's voice grade service may occur during the provisioning, trouble isolation or repair of the TC's advanced data service over a line sharing arrangement. The TC must obtain concurrence and acknowledgment from the customer.
D.	The TC must provide the Telephone Company with information regarding the type of xDSL technology that it deploys on each shared loop. The TC must notify the Telephone Company of any proposed change in technology on a shared loop in order for the Telephone Company to update loop records and anticipate effects that the change may have on the voice grade service and other loops in the same or adjacent binder groups.
E.	The TC shall attempt to notify the Telephone Company's end user customer prior to initiating any activity such as wiring or testing on a shared loop that may disrupt or interfere with the customer's voice grade service.

19. Line Sharing
19.1 General

19.1.5 Repair and Maintenance	
A.	The TC will be responsible for repairing advanced data services it offers over the line sharing arrangement. The Telephone Company will retain primary responsibility for voice band trouble tickets, including repairing analog voice grade services and the physical line between the loop demarcation point at the end user customer premises and the point of demarcation in the central office.
B.	When the Telephone Company provides inside wire maintenance services to the customer, the Telephone Company will only be responsible for testing and repairing the inside wire for the voice grade services. The Telephone Company will not test, repair, or upgrade inside wire to clear trouble calls associated with the TC's advanced data services.
C.	Before issuing a trouble ticket to the Telephone Company, the TC shall validate whether the customer's trouble arises from the TC's advanced data service. If the trouble is isolated to the analog voice grade service provided by the Telephone Company, a trouble ticket may be issued to the Telephone Company.
D.	If a customer reports a trouble on its voice grade service and the Telephone Company determines the cause arises from the TC's advanced data services equipment, including but not limited to splitter problems or TC activities, the Telephone Company will take the following action.
1.	**Step 1**—Notify the TC and request to test and correct, if applicable, the trouble on its advanced data service. The Telephone Company will allow the TC a reasonable opportunity to correct the problem.
2.	**Step 2**—When the degradation asserted under this section remains unresolved by the TC after a reasonable opportunity to correct the problem and the end user customer's service is degraded such that the end user customer cannot originate or receive voice grade calls or encounters unacceptable transmission, the Telephone Company will advise the DTE that a particular technology deployment is causing the significant degradation, provide specific and verifiable information to support its assertion and request authorization to remove the TC's data service, if necessary to restore the end user's voiceband service.

19. Line Sharing
19.1 General

19.1.5 Repair and Maintenance	
E.	In the event that the parties dispute the cause or source of a trouble on a line shared loop, the TC may request, and the Telephone Company will agree, to a joint technician meeting at the main distribution frame serving that loop, to perform testing on the loop. This joint meeting will occur within 24 hours of the request being made to the appropriate service center in the Telephone Company. The testing will follow routine procedures for clearing and isolating troubles and will employ hand-held testing devices selected, provided, and operated by the TC. Such testing will involve gaining intrusive access to the line shared loop to be tested (at one or more appearances on the main distribution frame or other distributing frames in the central office upon which the line shared loop appears) and connecting the hand-held testing devices thereto. Within 15 minutes of the meeting time agreed between the parties, the TC shall have permission to begin testing on the main distribution frame.
1.	In order for the parties to have a good faith dispute about the cause or source of a trouble on a line shared loop, the parties need only disagree about the cause or source of a trouble on a line shared loop. Nevertheless, to the extent that either party has facilities in place to conduct any other form of testing of the line shared loop, it must present whatever findings it has from that testing to the other party at the time of the meeting at the main distribution frame or within 24 hours thereof.

19. Line Sharing
19.2 Application of Rates and Charges

19.2.1 NRCs	
A.	The following NRCs apply as appropriate (refer to Part A, Section 3.3).
1.	**Service Order**
2.	**Service Connection-Central Office Wiring**—A First Link and an Additional Link NRC applies to each link arranged for line sharing.
3.	**Service Connection-Other**
4.	**Manual Intervention Surcharges** (on a standard basis or an expedited basis, as appropriate)
5.	**Installation Dispatch Out**
6.	**Customer Misdirect-In**
7.	**Customer Misdirect-Out**
8.	**Customer Not Ready-In**
9.	**Dispatch Out-Out of Hours**
B.	**Customer Misdirect-In**—Applies when the Telephone Company removes a TC's advanced data service pursuant to Section 19.1.5.

19.2.2 Additional Labor Charges	
A.	Additional labor charges include but are not limited to the following examples.
1.	**Dispatch Out**
2.	**Pair Swap**
3.	**Joint Meet Testing**

19.2.3 Other	
A.	**Wideband Test Access Monthly Rate**—Applies per line, when the TC elects this option.
B.	xDSL qualified and digital designed link rates and charges, as appropriate, will apply (refer to Part B, Section 5.4).
C.	Splitter arrangement rates and charges will apply (refer to Part E, Section 2.5 or 3.4).